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**U.S. DOE-FEMP HAZARDOUS WASTE
OH 689 0008 976
HAMILTON COUNTY TSD-GEN**

12/31/91

**OEPA/DOE-FO
2
LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
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2597 George V. Voinovich
Governor

December 31, 1991

RE: U.S. DOE-FEMP
HAZARDOUS WASTE
OH 689 0008 976
HAMILTON COUNTY
TSD-GEN

Mr. R. E. Tiller, Manager
U.S. DOE-FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Tiller:

This correspondence is in response to your letter dated November 18, 1991, to Mr. Paul Pardi of this office, detailing the compliance schedule for newly determined Uranyl Nitrate Hazardous Waste Management Units (HWMU) at the FEMP.

The indicated timetable for implementation of hazardous waste requirements for these units is acceptable with the following two exceptions:

1. Item 5 - Closure Plan Information.

The proposed date for submittal of Closure Plan Information on these HWMU's is given as May 31, 1997. This office will defer comment regarding an appropriate date for Closure Plan submittal pending the outcome of current facility/OEPA discussion on the subject of CERCLA/RCRA integration.

2. Item 12 - Update HWMU-specific training for personnel.

This item addresses the requirement that employees working in these areas have training specific to the HWMU hazards. This office expressed concern with the scheduling for this item in recent telephone conversations with John Sattler, WMC0. John indicated that the March 31, 1992 date was chosen somewhat arbitrarily, and subsequently reported in a fax transmission dated December 20, 1991, that "... site managers and supervisors will be notified that personnel without documentation that the appropriate training has been received will not be permitted to work in these areas unsupervised after January 17, 1992."

Date Rec'd JAN 02 1992

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Mr. R. E. Tiller
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2. Item 12 - Update HWMU-specific training for personnel
(continued)

It is my opinion that training for inspectors, maintenance, and other personnel working in these areas should have taken place shortly after these units were identified as HWMU's, in compliance with the intent of OAC 3745-65-16. This office suggests that this training component be completed no later than January 15, 1992.

Should you have any questions regarding this correspondence, please contact me at (513) 285-6090.

Sincerely,



Phillip C. Harris
Division of Hazardous Waste Management

cc: File